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VIA ECF

United States District Court
Southern District of New York
Attn: Hon. Colleen McMahon, Chief U.S.D.J.
500 Pearl Street, Courtroom 24A
New York, NY 10007-1312

RECD
OK
Colleen McMahon
9/18/2023

Re: Jerez v. Milea Truck Sales, Corp., et al.
Case No.: 1:23-cv-2562 (CM) (SDA)

Dear Judge McMahon:

This office represents Defendants in the above-referenced case. Defendants write to respectfully request a one (1) week extension of time to submit the parties' joint letter motion for settlement approval. Consistent with ¶ 1(D) of this Court's Individual Practices and Procedures. Defendants respectfully submit:

(i) Defendants were unable to earlier request the instant relief two days prior to the original deadline because your undersigned has been engaged on an emergency Order to show cause in Superb Motors v. Deo, 2:23-cv-6188 (OEM) (ST) in the Eastern District of New York, with three hours of oral argument before the Hon. Orelia E. Merchant, U.S.D.J. on Thursday, September 14, 2023 and an unanticipated in-person settlement conference held yesterday before the Hon. James M. Wicks, U.S.M.J., who made himself available due to the emergency relief we are seeking in that case, and in light of these circumstances and preparation for same, I was unable to timely complete the items in the latest Order;

(ii) the original deadline to submit the joint letter motion for settlement approval was yesterday, September 15, 2023;

(iii) there has been one previous request for an extension of time, which was granted on consent;

(iv) the adversary consents to the instant request; and

(v) the requested extension does not affect any other scheduled dates.

Accordingly, there exists both good cause and excusable neglect warranting this Court's exercise of discretion in favor of granted the requested extension of time. See Fed. R. Civ. P. 6(b)(1)(B).

Defendants thank this Court for its time and attention in this case.

Dated: Lake Success, New York
September 16, 2023

Respectfully submitted,

MILMAN LABUDA LAW GROUP PLLC

/s/ Emanuel Kataev, Esq.

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